

**KAZEROUNI LAW GROUP, APC**

Abbas Kazerounian, Esq. (SBN: 249203)

ak@kazlg.com

Jason A. Ibey, Esq. (SBN: 284607)

jason@kazlg.com

245 Fischer Avenue, Suite D1

Costa Mesa, California 92626

Telephone: (800) 400-6808

Facsimile: (800) 520-5523

*Attorneys for Plaintiff,*

Timothy Barrett

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA****Timothy Barrett, Individually  
and On Behalf of All Others  
Similarly Situated,****Plaintiff,****v.****Ecom Interactive, LLC d/b/a  
ZBiddy d/b/a ZBiddy.com,****Defendant.****Case No.: 13-CV-00939-BEN-NLS****CLASS ACTION****NOTICE OF REQUEST FOR  
VOLUNTARY DISMISSAL OF  
ACTION PURSUANT TO FED.  
R. CIV. P. 41(a)**

1 Plaintiff Timothy Barrett (“Mr. Barrett”) hereby requests dismissal of the  
2 above-captioned action against Defendant Ecom Interactive, LLC d/b/a ZBiddy  
3 d/b/a ZBiddy.com with prejudice as to Plaintiff’s individual claims and without  
4 prejudice as to the putative class claims, pursuant to Fed. R. Civ. P. 41(a).  
5 Therefore, Mr. Barrett respectfully requests that the above-captioned action be  
6 dismissed WITH PREJUDICE as to Plaintiff’s claims and WITHOUT prejudice as  
7 to the putative class claims.  
8

9 Respectfully submitted,

10 Dated: October 24, 2013

**KAZEROUNI LAW GROUP, APC**

11 BY: /s/ ABBAS KAZEROUNIAN  
12 ABBAS KAZEROUNIAN, ESQ.  
13 ATTORNEYS FOR PLAINTIFF  
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